

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF SARAH R. LONDON IN  
SUPPORT OF PLAINTIFF'S MOTION TO  
PRECLUDE UBER FROM CHERRY-  
PICKING CORPORATE TRIAL WITNESSES  
AND CALLING AT TRIAL LATE-  
DISCLOSED WITNESSES**

Judge: Honorable Charles R. Breyer  
Date: TBD  
Time: TBD  
Courtroom: 6 –17th Floor

DECLARATION OF SARAH R. LONDON  
Case No. 3:23-md-03084-CRB

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and  
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of  
4 the State Bar of California and am admitted to practice before this Court. I make this declaration  
5 based on my own personal knowledge. If called upon to testify, I could and would testify  
6 competently to the truth of the matters stated herein.

7 2. I submit this declaration in support of Plaintiff's Motion to Preclude Uber from  
8 Cherry-Picking Corporate Trial Witnesses and From Calling at Trial Late-Disclosed Witnesses.

9 3. On December 8, the parties exchanged witness lists. On December 11, Uber  
10 served a revised list. A true and correct copy of Uber's revised witness list, with the name of a  
11 third party redacted, is attached as **Exhibit A**.

12 4. Uber's list includes five Uber executives it "will likely call ... at trial" as live  
13 witnesses. Those witnesses are: Emilie Boman, Heather Childs, Chad Dobbs, Todd Gaddis, and  
14 Sachin Kansal.

15 5. Mr. Gaddis was not identified in Uber's initial or expert disclosures.

16 6. Mr. Gaddis's custodial file was never produced, nor was he deposed in his  
17 personal capacity.

18 7. Mr. Gaddis was deposed as a 30(b)(6) witness, but only on general topics  
19 concerning Uber's Safety Reports and statistics concerning numbers of rides and riders, not on  
20 anything about Ms. Dean's ride or audio recording.

21 8. Attached as **Exhibit B** is a true and correct copy of excerpts of the transcript of  
22 the July 11, 2025, Rule 30(B)(6) deposition of Mr. Gaddis, as well as Exhibits 1556, 1557, and  
23 1558 to that deposition (the 30(b)(6) topics). Mr. Gaddis was also deposed on November 7,  
24 2025, again as a 30(b)(6) witness, and again regarding Uber's Safety Data.

25 9. On December 4, 2025, Uber produced a declaration from Mr. Gaddis. A true  
26 and correct copy of that declaration is attached as **Exhibit C**. This exhibit has been filed under  
27 seal.  
28

10. Attached as **Exhibit D** is a true and correct copy of the October 24, 2025, Rebuttal Expert Report served by Vida Thomas. This document has been filed under seal.

11. Mr. Dobbs was not identified in Uber's initial or expert disclosures.

12. Mr. Dobbs's custodial file was never produced, nor was he deposed in his personal capacity.

13. Mr. Dobbs was deposed as a 30(b)(6) witness.

14. Attached as **Exhibit E** is a true and correct copy of excerpts of the transcript of the August 21, 2025, Rule 30(b)(6) deposition of Chad Dobbs, as well as Exhibit 1893 to that deposition (the 30(b)(6) topics).

15. Uber continues to produce documents, both general and case-specific.

16. For example, Mr. Fuldner's deposition concluded on April 29, 2025. Since then, according to Plaintiffs' document repository software, Uber has produced more than 60,000 documents, over 3,300 of which are associated with Mr. Fuldner.

17. In addition, prompted by Judge Jones's rulings, Uber has continued to de-designate hundreds of documents inappropriately withheld as privileged.

18. Attached hereto as **Exhibit F** is a true and correct copy of the order at *In re Pacific Fertility Center Litigation*, 18-cv-01586, ECF 792 (N.D. Cal. May 12, 2021).

19. Attached as **Exhibit G** is a true and correct copy of the transcript from *In re Pacific Fertility Center Litigation*, 18-cv-01586, ECF 810 (N.D. Cal. May 19, 2021).

20. Attached as **Exhibit H** is a true and correct copy of excerpts of a document produced by Uber, bates stamped UBER-MDL3084-BW-00006299. This document has been filed under seal.

21. Attached as **Exhibit I** is a true and correct copy of excerpts of the August 28, 2025, Rule 30(b)(6) deposition of Mariana Esteves.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of December, 2025 in San Francisco, California.

/s/ Sarah R. London  
Sarah R. London